

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	WTB Docket No. 07-121
Request For Declaratory Ruling By)	
Wireless Strategies Inc. Regarding)	DA 07-2684
Coordination of Microwave Links under)	
Part 101 of the Commission's Rules)	

REPLY COMMENTS OF BRIDGEWAY SYSTEMS INC.

Bridgeway Systems Inc. (BSI) submits these reply comments in the above-referenced proceeding.

BSI has been in the smart antenna business for over some time. Our vision, creative thinking, innovation, and investment in high-technology research and development programs are the mainstay of our business. We always have to balance our investments in research and development against the investment risk. That is why we strongly support Wireless Strategies' Request for a Declaratory Ruling, as it will remove any uncertainty that smart antennas resulting from our research and development can be bought and deployed by Fixed Microwave Service licensees operating under Part 101 of the Rules.

We note that not one of the entities who filed comments against WSI presented any evidence to support their petition to reject, instead they merely quoted various regulations without attaching any supporting evidence. Comsearch stated, “We believe that the operation described by WSI cannot by definition comply with the §101.115 antenna standards, and cannot comply with the §101.103 coordination requirements...”¹

¹ Comsearch p2

This assertion is just plain wrong, for in Wireless Strategies' Request they include the following conditions: "...a Fixed Services licensee is permitted to simultaneously coordinate multiple links whose transmitter elements collectively comply with the Commission's antenna standards (§101.115) and frequency coordination procedures (§101.103)."² Under the Rules, it is the antenna's RPE which is regulated, not any of the antenna elements. This is because an antenna's RPE is a log polar plot of antenna gain in dBi and angle in degrees; there is no distance and consequently it does not matter where the antenna elements are located. Therefore, if an antenna's RPE meets the FCC's antenna requirements, the path using the antennas can be coordinated in the usual manner.

BSI is very concerned that some opponents would try to stifle innovation by suggesting "...smart antennas should be authorized on an experimental basis..."³ and further proposing that a smart antenna is limited to an "antenna system where separate antennas work 'in concert to form beams'..."⁴ and that the FCC carefully "study and evaluate"⁵ the smart antenna proposal. BSI would like to point out that smart antennas have been in use in mission-critical situations for decades, and therefore no "experimentation" or "additional testing" is required to prove the technology.

² Wireless Strategies Request for a Declaratory Ruling, first page.

³ Harris-Stratex comments, D2.

⁴ Comsearch comments, p5

⁵ Verizon comments, p5

Finally, approval of Wireless Strategies' Request would both enable a licensee to reuse the licensed spectrum multiple times without increasing interference, and significantly lower the cost of providing microwave services.

Therefore, Bridgeway Systems respectfully requests that the Commission approve Wireless Strategies' Request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'F. Schuchardt', with a stylized flourish at the end.

Frederick H. Schuchardt
President and CEO
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